

of references. Specifically, claims 12 and 13 stand rejected as obvious over Logan in view of U.S. Patent No. 6,097,441 to Allport ("Allport"), claim 17 stands rejected as obvious over Logan, claims 2 and 21 stand rejected as obvious over Logan in view of the W3C's proposed recommendations to the HTML 4.01 Specification ("the W3C Recommendations") and claims 3 and 4 stand rejected as obvious over Logan in view of the W3C Recommendations and further in view of U.S. Patent No. 6,396,500 to Qureshi, et al. ("Qureshi").

The present invention according to independent claim 1 is directed to a method for organizing content available from a plurality of locations for presentation to viewers. To achieve this objective, a plurality of templates are provided, each template identifying one or more locations at which content is available and one or more transformation techniques to be applied to the content. The content is captured from the one or more locations specified in each template and transformed according to the transformation techniques specified in the template. The transformed content is inserted into the templates to create a set of content pages, which are distributed to the viewer. Independent claim 20 is directed to computer readable medium storing program code that when executed causes a computer to perform a technique that is analogous to the method of claim 1.

Logan, by contrast, discusses an interactive computer display kiosk for retrieval and display of hypertext documents through the use of conventional web browsing software (Col. 3, lns. 40 – 43 and Col. 4, lns. 23 – 33). Local storage at the kiosk stores hypertext documents that may comprise links to other locally stored pages or pages stored on a web server computer (Col 4, ln. 64 through Col. 5, ln. 4). The kiosk

also stores a set of programs that limit the user's access to authorized pages and modify text in HTML pages before those pages are presented for display (Col. 5, lns. 10 – 19).

The programs may also be used to add, delete or substitute a target different from that defined by a link or anchor in an HTML page (Col 7, lns. 7 – 12). Accordingly, a string list is provided that includes a collection of target+replacement string pairs (Col. 7, lns. 20-21). The programs may search an HTML page for a match to each of the target strings, which when found substitutes the replacement string for the target string in the page (Col. 7, lns. 21-25).

In rejecting claim 1, the Examiner has indicated that Logan comprises the element of storing locations where content is available. Claim 1, however, includes storing a plurality of templates that identify both one or more locations at which content is available and one or more transformation techniques to be applied to the content. While Logan does discuss storing hypertext documents locally on the hard disk of the kiosk, as well as remotely on a web server computer, there is no teaching as to storing templates that identify one or more locations where content is available and transformation techniques to be applied to the content.

Logan further fails to teach the claimed elements of transforming captured content by applying a transformation technique specified in a template and inserting the transformed content into the template to create a set of content pages. Logan discusses a rewriting mechanism or program that compares the contents of a hypertext document against a string list comprising target+replacement string pairs. The program searches for a match to each of the target strings and substitutes the replacement string for the target string when found (Col. 7, lns. 20 – 25). The mechanism of Logan only teaches searching

documents for target+replacement pairs and replacing strings as is appropriate, which affects documents on a global basis, as opposed to a per template basis as claimed in independent claims 1 and 20.

There is thus no teaching or suggestion in Logan to transform content on a per template basis. By using a template that identifies locations at which content is available and transformation techniques to be applied to the content, which content is inserted into the templates, the information needed to create a content page is stored in one centralized structure. Any changes to be made to the resultant content page may be implemented by modifying the location where content is available or the transformation technique to be applied without any concern as to the impact the change will have on other resultant content pages that another template or templates are used to create. The method of claim 1, therefore, provides for greater flexibility than, and is not suggested by, the HTML rewrite program taught by Logan. Because Logan fails to teach or suggest a number of elements comprising independent claims 1 and 20, withdrawal of the rejection and allowance of claims 1 and 20 is respectfully requested.

Turning to independent claim 17, Logan fails to teach a memory system storing a plurality of templates each identifying one or more locations at which content is available and one or more transformation techniques to be applied to the content. Logan solely teaches the use of local (the kiosk) or remote (web server) storage for hypertext documents and the use of a Uniform Resource Locator (URL) to identify the location of those documents. The use of templates as per independent claim 17 is distinguished from hypertext documents, as templates comprise the location of content as well as transformation techniques to be applied to the content. Templates offer a single structure

to identify one or more pieces of content and transformation techniques to be applied to the content, as opposed to a hypertext document, which only provides a series of "markup" tags that define how a browser or other hypertext rendering engine should render the hypertext document for display. Logan, therefore, fails to teach or suggest the element of a memory system for storing templates as presently claimed by independent claim 17.

Logan further fails to teach or discuss a display engine that performs content transformation in accordance with transformation techniques specified in a template and inserts transformed content in the template to create a set of content pages. Logan's HTML text replacement mechanism and URL transition display generating mechanism are not implemented in a template according to the system as claimed by claim 17. Templates identify where content is available, as well as transformation techniques to be applied to the content. The display engine transforms content in accordance with a transformation technique specified in the template and inserts the transformed content into the template to thereby create a content page. The HTML replacement and URL transition mechanisms both modify a hypertext document that a user requests prior to display on a display device, which is distinguished from a display engine using data specified in a template to create a content page. As there is no teaching of the use of templates that each identify one or more locations at which content is available and one or more transformation techniques to be applied to the content, Logan fails to teach the claimed element of a display engine that inserts transformed content into the templates to thereby create a set of content pages as per claim 17.

While the Examiner is correct in asserting that controllers are known in the art, Logan fails to teach the controller for retrieving templates from a memory system or for controlling the operation of the capture and display engines, which capture and transform content, respectively, according to information specified in the templates, thereby failing to render independent claim 17 obvious. Based on the foregoing, independent claim 17 is, therefore, not rendered obvious and allowance is respectfully requested.

Independent claim 21 is also distinguishable over Logan in view of the W3C Recommendations. The Examiner asserts that Logan discusses storing locations where content is available. Logan, however, fails to teach using a template to specify Internet sites, which are locations of content, as claimed by claim 21. Furthermore, Logan fails to teach or even suggest storing templates that each comprise slots adapted to hold content retrieved from Internet sites and a transformation technique for transforming the content. This structure, a template comprising a slot adapted to hold content retrieved from Internet sites and a transformation technique for transforming the content, is also absent from the W3C Recommendations.

Although the Examiner asserts that the W3C Recommendations disclose inserting content into slots, a review of the document reveals only a discussion of HTML frames. HTML frames allow authors to present documents in multiple views that may be independent windows or sub-windows (<http://www.w3.org/TR/1999/PR-html40-19990824/present/frames.html#h-16.1>). Even assuming for the sake of argument that HTML frames are the equivalent of the slot for each Internet site in the template as claimed in claim 21, there is no teaching in either Logan or the W3C Recommendations

of a template that specifies one or more Internet sites, a slot adapted to hold content retrieved from the Internet site and a transformation technique for transforming the content.

The combination of Logan and the W3C Recommendations further fail to suggest creating a plurality of album pages containing content and organizing the album pages into an Internet album in accordance with a defined ordering scheme. The Examiner asserts that Logan discusses "a defined sequence". Although Logan discusses a methodology for displaying leading and/or trailing hypertext pages when a given hypertext document is requested by the user (Col. 9, ln. 14 – 33); there is no instruction as to how content pages generated from templates as claimed are to be ordered for delivery. According to the element as claimed, however, album pages themselves are organized in accordance with a defined ordering scheme, not the random order in which a user follows a series of links displayed within a set of rendered hypertext documents.

In addition to the foregoing, the W3C Recommendations are not admitted to be and would ultimately not be found to constitute prior art since Applicant's date of invention precedes its publication; Applicant's undersigned counsel has documentary evidence establishing a date of invention prior to said publication date. Similarly, Qureshi is not admitted to be and would ultimately not be found to constitute prior art since Applicant's date of invention precedes its filing date; Applicant's undersigned counsel has documentary evidence establishing a date of invention prior to said filing date.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the prior

art of record. Given the applicants' position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

For at least all of the above reasons, Applicants respectfully request that the Examiner withdraw all rejections, and allowance of all the pending claims is respectfully solicited. To expedite prosecution of this application to allowance, the examiner is invited to call the applicants' undersigned representative to discuss any issues relating to this application.

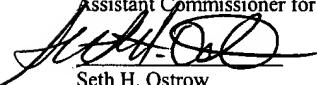
Respectfully submitted,



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